

February 7, 2001

Docket No. 00N-1396 & Docket No. 00D-1598

FDA Commissioner, Dockets Management Branch (HFA-40205) FEB 13 11:08

Food and Drug Administration

5630 Fishers Lane, Room 1061

Rockville, MD 20852

Genetic engineering involves manipulations of genes between different species and allows scientists to bypass the natural barriers, which protect the genetic integrity of species. Foods containing or produced from genetic engineering can cause allergic responses, be toxic, have lowered nutritional value and/or compromise immune responses in consumers. Of great importance, genetically engineered crops can have unpredictable, Irreversible changes to the environment.

FDA's proposal for companies to merely voluntary consult with FDA concerning the safety of their foods is totally inadequate. FDA must require MANDATORY pre-market safety testing. Even so, companies will have no way to prove something is safe!!

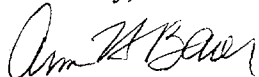
FDA's proposed rule that environmental review procedures be exempt under the National Environmental Policy Act does not protect the environment. FDA must require MANDATORY pre-market environmental review.

FDA's proposed rule makes all labeling of genetically engineered foods (GEFs) only voluntary. This does not protect my right-to-know or allow me consumer choice to protect my family and the environment. Voluntary labeling unfairly reverses the financial burden onto producers who do not use GEFs. Mandatory labeling is essential for the traceability of GEF products throughout the food supply for health professionals. Mandatory labeling also protects overseas markets for farmers. FDA must require MANDATORY labeling of GEFs.

FDA's proposed rule is unlikely to provide the public with adequate information on GEFs for independent review. The FDA notes that producers of GEFs may claim that any such information, including the pre-market notification, is trade secret or confidential business information subject to exemption from public disclosure requirements. FDA must require full disclosure.

I will settle for nothing less than mandatory safety testing, labeling, pre-market environmental review, and full disclosure. All GEFs should be taken off supermarket shelves until these are established.

Sincerely,



Ann Baier

P.O. Box 612 Winters, CA 95694

00D-1598

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Questioning Conventional Wisdom

A Farmer's Perspective on the Perennial Farm Crisis

By Paul Muller

Paul Muller is an organic farmer and partner at Full Belly Farm in California. The 250-acre farm has vegetables, orchards and a livestock operation in Yolo County's Capay Valley. Muller and his wife, Dru Rivers, were honored last year by the University of California Small Farm Center as Small Farmers of the Year. He has served on the board of the California Certified Organic Farmers and the Yolo Land Trust and has a B.S. in ag economics from UC Berkeley. These remarks were presented in August 2000 to a forum on biotechnology hosted by Community Alliance with Family Farmers and the California Agricultural Leadership Program for members of the Washington, D.C. Educational Fellowship Committee.

530/796-3464

I'm a farmer. I grew up on a farm in San Jose and I've been around agriculture all my life. I have four brothers who are all commercial farmers. We grew up in the nurturing, independent, hard-working environment that everyone these days believes is the foundation of agriculture.

Presently on my farm we grow 70 different types of crops. We've tried to develop models that are a big contrast to most commercial farms. So I'm not an expert. I'm a generalist.

On the farm where I lived and on neighboring farms, we applied the technologies we learned from the university. We followed the directions of research about pesticides and new product development. My perspective is that some of those don't work.

Today I see the success of agriculture measured by the amount of food you produce. In fact, the number one issue in agriculture over the last 20 to 30 years has been our ability to overproduce, so that farmers are not compensated justly for the fruits of their labor. As a result, we see the perennial farm crisis everyone talks about.

If farm prices are low, then new technologies look like the solution for bailing out farmers, because the treadmill that we're on means that we have to produce

more at a lower cost. Of course, producing more at a lower cost means that prices are going to be lower, or that you have to expand markets.

But we are now at a point where there is less opportunity to expand those markets,

since so many other countries have become exporting nations. As the international community becomes aware of the technologies we employ here, and as the USDA and other government agencies sound the drum

As I was looking for answers about the effects of the herbicides that were applied to the tomatoes, I was changing sprinkler pipes every day in the mud.

to export our technologies and products, other countries are saying, "We don't want those crops here. We don't want to live around the effects of that technology."

Don't Be Afraid to Ask Questions

I grew up on a farm where we sprayed chlordane or lindane and metasystox and other farm chemicals. The turning point in my life was going to the university and asking questions like, "Where can I find out about the health effects of these products on myself, my family, my farm and my neighbors?"

I saw neighbors dying of cancer. We all know that farmers have one of the highest occupational cancer rates of any group in this country.

My neighbors were applying the technology that would give them a mar-

Ann
Po Box 612
Winters CA
95694



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5630 Fishers Lane Rm 1061

Rockville, MD